

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
Helen-Wong Armijo, FCR, Inc., Skybridge Spectrum	)	WT Docket No. 16-385
Foundation, and Telesaurus Holdings GB LLC,	)	
Requests For Multilateration Location And	)	
Monitoring Service Waiver And Construction	)	
Extensions	)	

**COMMENTS OF ITRON, INC.  
ON REQUESTS FOR WAIVER AND CONSTRUCTION  
DEADLINE EXTENSIONS**

Itron, Inc. (“Itron”)<sup>1</sup>, by its attorneys, hereby submits these comments with respect to the requests of Helen-Wong Armijo, FCR, Inc., Skybridge Spectrum Foundation, and Telesaurus Holdings GB LLC in the above-captioned proceeding for waiver of the Commission’s rules that govern the operation of Location and Monitoring Service (“LMS”) in the 902-928 MHz band (“Waiver Requests”)<sup>2</sup> and for a further extension of time to complete even an initial buildout of licenses already long past their original construction deadlines.

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<sup>1</sup> Itron is interested in this proceeding because it is a leading manufacturer and supplier of RF-based automatic meter reading (“AMR”) and advanced metering infrastructure (“AMI”) technologies, serving electric, gas and water utility companies nationwide. Many of these systems operate in the 902-928 MHz band, which has become an essential resource for such operations. 902-928 MHz Part 15 devices have become vital to America’s infrastructure and our national security as many of our nation’s utility companies rely on AMR systems not merely for billing but for efficient management of energy production and planning as well as mission critical process control systems, such as supervisory control and data acquisition.

<sup>2</sup> *Wireless Telecommunications Bureau Seeks Comment on Helen-Wong Armijo, FCR, Inc., Skybridge Spectrum Foundation, and Telesaurus Holdings GB LLC, Requests For Multilateration Location And Monitoring Service Waiver And Construction Extensions*, WT Docket No. 16-385, Public Notice, DA 16-1273 (rel. Nov. 10, 2016).

As it did earlier in response to a similar request for extension of construction deadline filed by PCS Partners, Itron has concerns regarding the case presented in the Waiver Requests for still another long extension of time to put the LMS licensed spectrum to use.<sup>3</sup> Such continuing extensions will encourage others with licensed but unused spectrum to disregard their license requirements and to seek to alter the parameters of such possible use, all to the detriment of unlicensed users faced with the changing uncertainty of how the band in which they operate will have to be shared. The Commission should hold M-LMS licensees that filed the Waiver Requests to their current deadlines. If they cannot use the spectrum for its intended purpose by those dates despite prior extensions, their licenses should be terminated.<sup>4</sup>

Respectfully submitted,

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<sup>3</sup> Comments of Itron, Inc., WT Docket No. 16-149, at 2-3 (May 24, 2016).

<sup>4</sup> See Comments of Landis+Gyr Technology, Inc., WT Docket No. 16-149, at 4-6 (May 24, 2016); Comments of the Wireless Internet Service Providers Association, WT Docket No. 16-149, at 2-4 (May 24, 2016); Comments of Public Knowledge, Consumer Federation of America, and The Open Technology Institute, WT Docket No. 16-149, at 2-3 (May 24, 2016).